

### Wiley Rein & Fielding LLP

# ORIGINAL

### DOCKET FILE COPY ORIGINAL

1776 K STREET NW WASHINGTON, DC 20006 PHONE 202 719 7000 202 719 7049

Virginia Office 7925 JONES BRANCH DRIVE SHITE 6200 McLEAN, VA 22102 PHONE 703 905 2800

703 905 2820

www.wrf.com

May 11, 2004

**RECEIVED** 

Martha E Heller 202.719.3234 mheller@wrf.com

VIA HAND DELIVERY

MAY 1 1 2004

OFFICE OF THE SECRETARY

FEDERAL COMMUNICATIONS COMMISSION Marlene Dortch, Secretary Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554

Dear Ms Dortch:

On behalf of Belo Corp. ("Belo"), please file the attached letters in the abovecaptioned proceeding. The letters, which are from Robert W. Decherd, Belo's Chairman of the Board, President, and Chief Executive Officer, to each of the FCC Commissioners, describe Belo's ongoing offering of "It's Your Time," a program providing free airtime to congressional and gubernatorial candidates.

Localism Task Force, GC Docket No. RM-10803

Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,

Melber

Martha E. Heller

cc:

Chairman Michael K. Powell

Commissioner Kathleen Q. Abernathy

Commissioner Michael J. Copps

Commissioner Kevin J. Martin

Commissioner Jonathan S. Adelstein

No. of Copies rec'd\_ List ABCDE

Robert W. Decherd Chairman of the Board President and Chief Executive Officer

April 30, 2004

The Honorable Michael Copps Commissioner Federal Communications Commission 445 12<sup>th</sup> Street, SW Washington, D.C. 20554

RE: Belo 2004 Election Coverage Commitment

Dear Commissioner Copps:

Belo Corp. is pleased to advise you that for the fifth consecutive election cycle we are offering free broadcast airtime to qualified Congressional and gubernatorial candidates in each of Belo's 15 television markets. Additionally, Belo's news-producing stations have each committed to provide overall election coverage for more than one hour per week for the six weeks prior to election day. Details of Belo's commitment are contained in the enclosed press release. Candidates eligible to take advantage of our free airtime offer will be separately contacted by our local station general managers.

Since Belo initiated the nation's first free airtime program in 1996, other stations have followed our lead in making similar commitments. Broadcasters have been criticized by some Washington policy-makers and advocacy groups for a lack of public interest-programming. The Federal Communications Commission is actively considering the public interest obligations associated with digital television service. Belo and other like-minded broadcasters provide their viewers and communities with significant information to make informed decisions at the polls. We do this voluntarily without a specific federal mandate. Furthermore, we voluntarily hold ourselves accountable to our commitment by releasing detailed information after the election about the coverage provided in each of our markets.

Continued. . .

The Honorable Michael Copps April 30, 2004 Page Two

If Belo can provide further information or answer any questions at any time, I hope you will contact me at 214-977-8277 or Guy Kerr, Belo's senior vice president/Law and Government at 214-977-6692.

Thanks for your continued public service.

Sincerely,

RWD/vm

### News Release

FOR IMMEDIATE RELEASE
April 16, 2004
7 A.M. CST

## BELO OFFERS FREE AIRTIME TO CANDIDATES FOR FIFTH CONSECUTIVE ELECTION CYCLE AND EXPANDS 2004 POLITICAL COVERAGE

DALLAS – Belo Corp. (NYSE: BLC), which in 1996 became the first commercial television station group to provide free airtime for congressional and gubernatorial candidates, announced that it will offer the "It's Your Time" program for the fifth consecutive election cycle this fall.

The Company also announced increased election coverage plans, stating that Belo's news-producing stations will televise at least one hour of political coverage each week in the six weeks prior to the general election on November 2. The Company's expanded election coverage in 2004 will include debates, issue- and ad-watch programming, and interviews with local, state and federal candidates. In 2002, Belo stations sponsored 30 congressional and gubernatorial debates.

Candidates participating in "It's Your Time" each receive five minutes of free airtime – four minutes to tell viewers why they should be elected and one minute to answer a question specific to the candidate's individual race. In 2002, 104 qualified candidates for U.S. House, U.S. Senate and state gubernatorial offices participated in "It's Your Time." Since the program's inception, Belo has provided free airtime to more than 400 candidates.

"Belo took this groundbreaking step eight years ago to ensure that we were doing all we could to create an informed electorate in the communities we serve. Belo's voluntary effort achieves the goals of providing robust debate and increasing viewer knowledge without a government mandate," said Robert W. Decherd, chairman, president and chief executive officer. "Since Belo's introduction of this unprecedented program, other broadcast companies have joined Belo's efforts and are providing free airtime in their respective markets."

Belo's coverage plans for the six weeks prior to the election include:

News-producing television stations in Belo markets will broadcast an hour of issueor candidate-centered election coverage per week. This will include candidate
interviews, live debates, and issue- and ad-watch programming. Most stories will be
locally produced and will cover federal, state and local races.

- Belo Interactive Web sites will post candidate issue statements and question-andanswer sessions. E-town meetings will also be hosted on several of Belo's Web sites, allowing voters to express their opinions and gather information on relevant local issues in an online setting. Belo Interactive sites also will provide voter registration information and links to helpful voting-related sites.
- Belo's regional and local cable news channels will offer a variety of programming, including one-on-one candidate interviews, single-issue debates, and replays of "It's Your Time" segments and Belo election coverage.

#### **About Belo**

Robert W. Decherd Chairman of the Board President and Chief Executive Officer

April 30, 2004

The Honorable Jonathan Adelstein Commissioner Federal Communications Commission 445 12<sup>th</sup> Street, SW Washington, D.C. 20554

RE: Belo 2004 Election Coverage Commitment

Dear Commissioner Adelstein:

Belo Corp. is pleased to advise you that for the fifth consecutive election cycle we are offering free broadcast airtime to qualified Congressional and gubernatorial candidates in each of Belo's 15 television markets. Additionally, Belo's news-producing stations have each committed to provide overall election coverage for more than one hour per week for the six weeks prior to election day. Details of Belo's commitment are contained in the enclosed press release. Candidates eligible to take advantage of our free airtime offer will be separately contacted by our local station general managers.

Since Belo initiated the nation's first free airtime program in 1996, other stations have followed our lead in making similar commitments. Broadcasters have been criticized by some Washington policy-makers and advocacy groups for a lack of public interest-programming. The Federal Communications Commission is actively considering the public interest obligations associated with digital television service. Belo and other like-minded broadcasters provide their viewers and communities with significant information to make informed decisions at the polls. We do this voluntarily without a specific federal mandate. Furthermore, we voluntarily hold ourselves accountable to our commitment by releasing detailed information after the election about the coverage provided in each of our markets.

Continued . . .

The Honorable Jonathan Adelstein April 30, 2004 Page Two

If Belo can provide further information or answer any questions at any time, I hope you will contact me at 214-977-8277 or Guy Kerr, Belo's senior vice president/Law and Government at 214-977-6692.

Thanks for your continued public service.

Sincerely,

RWD/vm

### **News Release**

FOR IMMEDIATE RELEASE
April 16, 2004
7 A.M. CST

## BELO OFFERS FREE AIRTIME TO CANDIDATES FOR FIFTH CONSECUTIVE ELECTION CYCLE AND EXPANDS 2004 POLITICAL COVERAGE

DALLAS – Belo Corp. (NYSE: BLC), which in 1996 became the first commercial television station group to provide free airtime for congressional and gubernatorial candidates, announced that it will offer the "It's Your Time" program for the fifth consecutive election cycle this fall.

The Company also announced increased election coverage plans, stating that Belo's newsproducing stations will televise at least one hour of political coverage each week in the six weeks prior to the general election on November 2. The Company's expanded election coverage in 2004 will include debates, issue- and ad-watch programming, and interviews with local, state and federal candidates. In 2002, Belo stations sponsored 30 congressional and gubernatorial debates.

Candidates participating in "It's Your Time" each receive five minutes of free airtime – four minutes to tell viewers why they should be elected and one minute to answer a question specific to the candidate's individual race. In 2002, 104 qualified candidates for U.S. House, U.S. Senate and state gubernatorial offices participated in "It's Your Time." Since the program's inception, Belo has provided free airtime to more than 400 candidates.

"Belo took this groundbreaking step eight years ago to ensure that we were doing all we could to create an informed electorate in the communities we serve. Belo's voluntary effort achieves the goals of providing robust debate and increasing viewer knowledge without a government mandate," said Robert W. Decherd, chairman, president and chief executive officer. "Since Belo's introduction of this unprecedented program, other broadcast companies have joined Belo's efforts and are providing free airtime in their respective markets."

Belo's coverage plans for the six weeks prior to the election include:

News-producing television stations in Belo markets will broadcast an hour of issueor candidate-centered election coverage per week. This will include candidate
interviews, live debates, and issue- and ad-watch programming. Most stories will be
locally produced and will cover federal, state and local races.

- Belo Interactive Web sites will post candidate issue statements and question-and-answer sessions. E-town meetings will also be hosted on several of Belo's Web sites, allowing voters to express their opinions and gather information on relevant local issues in an online setting. Belo Interactive sites also will provide voter registration information and links to helpful voting-related sites.
- Belo's regional and local cable news channels will offer a variety of programming, including one-on-one candidate interviews, single-issue debates, and replays of "It's Your Time" segments and Belo election coverage.

#### **About Belo**

Robert W. Decherd Chairman of the Board President and Chief Executive Officer

April 30, 2004

The Honorable Kevin Martin Commissioner Federal Communications Commission 445 12<sup>th</sup> Street, SW Washington, D.C. 20554

RE: Belo 2004 Election Coverage Commitment

Dear Commissioner Martin:

Belo Corp. is pleased to advise you that for the fifth consecutive election cycle we are offering free broadcast airtime to qualified Congressional and gubernatorial candidates in each of Belo's 15 television markets. Additionally, Belo's news-producing stations have each committed to provide overall election coverage for more than one hour per week for the six weeks prior to election day. Details of Belo's commitment are contained in the enclosed press release. Candidates eligible to take advantage of our free airtime offer will be separately contacted by our local station general managers.

Since Belo initiated the nation's first free airtime program in 1996, other stations have followed our lead in making similar commitments. Broadcasters have been criticized by some Washington policy-makers and advocacy groups for a lack of public interest-programming. The Federal Communications Commission is actively considering the public interest obligations associated with digital television service. Belo and other like-minded broadcasters provide their viewers and communities with significant information to make informed decisions at the polls. We do this voluntarily without a specific federal mandate. Furthermore, we voluntarily hold ourselves accountable to our commitment by releasing detailed information after the election about the coverage provided in each of our markets.

Continued. . .

The Honorable Kevin Martin April 30, 2004 Page Two

If Belo can provide further information or answer any questions at any time, I hope you will contact me at 214-977-8277 or Guy Kerr, Belo's senior vice president/Law and Government at 214-977-6692.

Thanks for your continued public service.

Sincerely,

RWD/vm

### **News Release**

FOR IMMEDIATE RELEASE April 16, 2004 7 A.M. CST

## BELO OFFERS FREE AIRTIME TO CANDIDATES FOR FIFTH CONSECUTIVE ELECTION CYCLE AND EXPANDS 2004 POLITICAL COVERAGE

DALLAS – Belo Corp. (NYSE: BLC), which in 1996 became the first commercial television station group to provide free airtime for congressional and gubernatorial candidates, announced that it will offer the "It's Your Time" program for the fifth consecutive election cycle this fall.

The Company also announced increased election coverage plans, stating that Belo's news-producing stations will televise at least one hour of political coverage each week in the six weeks prior to the general election on November 2. The Company's expanded election coverage in 2004 will include debates, issue- and ad-watch programming, and interviews with local, state and federal candidates. In 2002, Belo stations sponsored 30 congressional and gubernatorial debates.

Candidates participating in "It's Your Time" each receive five minutes of free airtime – four minutes to tell viewers why they should be elected and one minute to answer a question specific to the candidate's individual race. In 2002, 104 qualified candidates for U.S. House, U.S. Senate and state gubernatorial offices participated in "It's Your Time." Since the program's inception, Belo has provided free airtime to more than 400 candidates.

"Belo took this groundbreaking step eight years ago to ensure that we were doing all we could to create an informed electorate in the communities we serve. Belo's voluntary effort achieves the goals of providing robust debate and increasing viewer knowledge without a government mandate," said Robert W. Decherd, chairman, president and chief executive officer. "Since Belo's introduction of this unprecedented program, other broadcast companies have joined Belo's efforts and are providing free airtime in their respective markets."

Belo's coverage plans for the six weeks prior to the election include:

News-producing television stations in Belo markets will broadcast an hour of issueor candidate-centered election coverage per week. This will include candidate
interviews, live debates, and issue- and ad-watch programming. Most stories will be
locally produced and will cover federal, state and local races.

- Belo Interactive Web sites will post candidate issue statements and question-and-answer sessions. E-town meetings will also be hosted on several of Belo's Web sites, allowing voters to express their opinions and gather information on relevant local issues in an online setting. Belo Interactive sites also will provide voter registration information and links to helpful voting-related sites.
- Belo's regional and local cable news channels will offer a variety of programming, including one-on-one candidate interviews, single-issue debates, and replays of "It's Your Time" segments and Belo election coverage.

#### **About Belo**

Robert W. Decherd Chairman of the Board President and Cluef Executive Officer

April 30, 2004

The Honorable Michael K. Powell Chairman Federal Communications Commission 445 12<sup>th</sup> Street, SW Washington, D.C. 20554

RE: Belo 2004 Election Coverage Commitment

Dear Chairman Powell:

Belo Corp. is pleased to advise you that for the fifth consecutive election cycle we are offering free broadcast airtime to qualified Congressional and gubernatorial candidates in each of Belo's 15 television markets. Additionally, Belo's news-producing stations have each committed to provide overall election coverage for more than one hour per week for the six weeks prior to election day. Details of Belo's commitment are contained in the enclosed press release. Candidates eligible to take advantage of our free airtime offer will be separately contacted by our local station general managers.

Since Belo initiated the nation's first free airtime program in 1996, other stations have followed our lead in making similar commitments. Broadcasters have been criticized by some Washington policy-makers and advocacy groups for a lack of public interest-programming. The Federal Communications Commission is actively considering the public interest obligations associated with digital television service. Belo and other like-minded broadcasters provide their viewers and communities with significant information to make informed decisions at the polls. We do this voluntarily without a specific federal mandate. Furthermore, we voluntarily hold ourselves accountable to our commitment by releasing detailed information after the election about the coverage provided in each of our markets.

Continued...

The Honorable Michael K. Powell April 30, 2004 Page Two

If Belo can provide further information or answer any questions at any time, I hope you will contact me at 214-977-8277 or Guy Kerr, Belo's senior vice president/Law and Government at 214-977-6692.

Thanks for your continued public service.

Sincerely,

RWD/vm

## **News Release**

4.5

FOR IMMEDIATE RELEASE April 16, 2004 7 A.M. CST

## BELO OFFERS FREE AIRTIME TO CANDIDATES FOR FIFTH CONSECUTIVE ELECTION CYCLE AND EXPANDS 2004 POLITICAL COVERAGE

DALLAS - Belo Corp. (NYSE: BLC), which in 1996 became the first commercial television station group to provide free airtime for congressional and gubernatorial candidates, announced that it will offer the "It's Your Time" program for the fifth consecutive election cycle this fall.

The Company also announced increased election coverage plans, stating that Belo's news-producing stations will televise at least one hour of political coverage each week in the six weeks prior to the general election on November 2. The Company's expanded election coverage in 2004 will include debates, issue- and ad-watch programming, and interviews with local, state and federal candidates. In 2002, Belo stations sponsored 30 congressional and gubernatorial debates.

Candidates participating in "It's Your Time" each receive five minutes of free airtime – four minutes to tell viewers why they should be elected and one minute to answer a question specific to the candidate's individual race. In 2002, 104 qualified candidates for U.S. House, U.S. Senate and state gubernatorial offices participated in "It's Your Time." Since the program's inception, Belo has provided free airtime to more than 400 candidates.

"Belo took this groundbreaking step eight years ago to ensure that we were doing all we could to create an informed electorate in the communities we serve. Belo's voluntary effort achieves the goals of providing robust debate and increasing viewer knowledge without a government mandate," said Robert W. Decherd, chairman, president and chief executive officer. "Since Belo's introduction of this unprecedented program, other broadcast companies have joined Belo's efforts and are providing free airtime in their respective markets."

Belo's coverage plans for the six weeks prior to the election include:

• News-producing television stations in Belo markets will broadcast an hour of issueor candidate-centered election coverage per week. This will include candidate interviews, live debates, and issue- and ad-watch programming. Most stories will be locally produced and will cover federal, state and local races.

- Belo Interactive Web sites will post candidate issue statements and question-and-answer sessions. E-town meetings will also be hosted on several of Belo's Web sites, allowing voters to express their opinions and gather information on relevant local issues in an online setting. Belo Interactive sites also will provide voter registration information and links to helpful voting-related sites.
- Belo's regional and local cable news channels will offer a variety of programming, including one-on-one candidate interviews, single-issue debates, and replays of "It's Your Time" segments and Belo election coverage.

#### **About Belo**

Robert W. Decherd Chairman of the Board President and Chief Executive Officer

April 30, 2004

The Honorable Kathleen Abernathy Commissioner Federal Communications Commission 445 12<sup>th</sup> Street, SW Washington, D.C. 20554

RE: Belo 2004 Election Coverage Commitment

Dear Commissioner Abernathy:

Belo Corp. is pleased to advise you that for the fifth consecutive election cycle we are offering free broadcast airtime to qualified Congressional and gubernatorial candidates in each of Belo's 15 television markets. Additionally, Belo's news-producing stations have each committed to provide overall election coverage for more than one hour per week for the six weeks prior to election day. Details of Belo's commitment are contained in the enclosed press release. Candidates eligible to take advantage of our free airtime offer will be separately contacted by our local station general managers.

Since Belo initiated the nation's first free airtime program in 1996, other stations have followed our lead in making similar commitments. Broadcasters have been criticized by some Washington policy-makers and advocacy groups for a lack of public interest-programming. The Federal Communications Commission is actively considering the public interest obligations associated with digital television service. Belo and other like-minded broadcasters provide their viewers and communities with significant information to make informed decisions at the polls. We do this voluntarily without a specific federal mandate. Furthermore, we voluntarily hold ourselves accountable to our commitment by releasing detailed information after the election about the coverage provided in each of our markets.

Continued. . .

The Honorable Kathleen Abernathy April 30, 2004 Page Two

If Belo can provide further information or answer any questions at any time, I hope you will contact me at 214-977-8277 or Guy Kerr, Belo's senior vice president/Law and Government at 214-977-6692.

Thanks for your continued public service.

Sincerely,

RWD/vm

### **News Release**

FOR IMMEDIATE RELEASE
April 16, 2004
7 A.M. CST

## BELO OFFERS FREE AIRTIME TO CANDIDATES FOR FIFTH CONSECUTIVE ELECTION CYCLE AND EXPANDS 2004 POLITICAL COVERAGE

DALLAS – Belo Corp. (NYSE: BLC), which in 1996 became the first commercial television station group to provide free airtime for congressional and gubernatorial candidates, announced that it will offer the "It's Your Time" program for the fifth consecutive election cycle this fall.

The Company also announced increased election coverage plans, stating that Belo's newsproducing stations will televise at least one hour of political coverage each week in the six weeks prior to the general election on November 2. The Company's expanded election coverage in 2004 will include debates, issue- and ad-watch programming, and interviews with local, state and federal candidates. In 2002, Belo stations sponsored 30 congressional and gubernatorial debates.

Candidates participating in "It's Your Time" each receive five minutes of free airtime – four minutes to tell viewers why they should be elected and one minute to answer a question specific to the candidate's individual race. In 2002, 104 qualified candidates for U.S. House, U.S. Senate and state gubernatorial offices participated in "It's Your Time." Since the program's inception, Belo has provided free airtime to more than 400 candidates.

"Belo took this groundbreaking step eight years ago to ensure that we were doing all we could to create an informed electorate in the communities we serve. Belo's voluntary effort achieves the goals of providing robust debate and increasing viewer knowledge without a government mandate," said Robert W. Decherd, chairman, president and chief executive officer. "Since Belo's introduction of this unprecedented program, other broadcast companies have joined Belo's efforts and are providing free airtime in their respective markets."

Belo's coverage plans for the six weeks prior to the election include:

News-producing television stations in Belo markets will broadcast an hour of issueor candidate-centered election coverage per week. This will include candidate
interviews, live debates, and issue- and ad-watch programming. Most stories will be
locally produced and will cover federal, state and local races.

- Belo Interactive Web sites will post candidate issue statements and question-and-answer sessions. E-town meetings will also be hosted on several of Belo's Web sites, allowing voters to express their opinions and gather information on relevant local issues in an online setting. Belo Interactive sites also will provide voter registration information and links to helpful voting-related sites.
- Belo's regional and local cable news channels will offer a variety of programming, including one-on-one candidate interviews, single-issue debates, and replays of "It's Your Time" segments and Belo election coverage.

#### **About Belo**